

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

RAW STORY MEDIA, INC., ALTERNET  
MEDIA, INC.,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC,  
OPENAI, LLC, OPENAI OPCO LLC,  
OPENAI GLOBAL LLC, OAI  
CORPORATION, LLC, and OPENAI  
HOLDINGS, LLC,

Defendants.

No. 1:24-cv-01514-CM

**PLAINTIFF'S NOTICE OF SUPPLEMENTAL AUTHORITY**

Plaintiff writes to inform the Court of a recent decision against a different AI company, Meta Platforms, Inc., in which a district court denied Meta's motion to dismiss a 17 U.S.C. § 1202(b)(1) claim against it. The Court held that the plaintiffs had standing, including because "the plaintiffs allege that the CMI removal facilitated and concealed actual infringement of their copyrights," and that they plausibly alleged all the elements of their claim. Order at 1, *Kadrey v. Meta Platforms, Inc.*, No. 23-cv-03417 (N.D. Cal. Mar. 7, 2025), ECF No. 471. The decision is attached as Exhibit 1.

RESPECTFULLY SUBMITTED,

/s/ Stephen Stich Match

Jon Loevy\*  
Michael Kanovitz\*  
Stephen Stich Match (No. 5567854)  
Matthew Topic\*  
Thomas Kayes\*  
Steven Art\*  
Kyle Wallenberg\*

LOEVY & LOEVY  
311 North Aberdeen, 3rd Floor  
Chicago, IL 60607  
312-243-5900  
jon@loevy.com  
mike@loevy.com  
match@loevy.com  
matt@loevy.com  
kayes@loevy.com  
steve@loevy.com  
wallenberg@loevy.com

*\*pro hac vice*

March 11, 2025